

**EXHIBIT 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>CarePoint Health Systems Inc. d/b/a Just Health Foundation, <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 11</p> <p>Case No. 24-12534 (JKS)</p> <p>(Jointly Administered)</p> <p><b>Re: Docket Nos. 555, 718, &amp; 744</b></p>
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**STIPULATION CONCERNING INSIGHT MANAGEMENT AND CONSULTING SERVICES, INC.’S CLAIM AND VOTING ON THE PLAN**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), the Official Committee of Unsecured Creditors (the “Committee”) and Insight Management and Consulting Services, Inc. (“Insight” and, with the Debtors and the Committee, the “Parties”) hereby agree and stipulate as follows (the “Stipulation”):

**WHEREAS**, on January 24, 2025, the Court entered the *Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief* [Docket No. 555] (the “Solicitation Procedures Order”).

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

**WHEREAS**, the Solicitation Procedures Order established March 3, 2025, at 4:00 p.m. (prevailing Eastern Time) as the deadline to submit Ballots to accept or reject the Plan (the “Voting Deadline”). See Solicitation Procedures Order, ¶¶ 4, 15.

**WHEREAS**, on February 20, 2025, Insight filed *Insight Management and Consulting Services, Inc.’s Motion for Estimation and Temporary Allowance of its Claim Solely for Voting Purposes Pursuant to Bankruptcy Rule 3018* [Docket No. 718] (the “3018 Motion”).<sup>2</sup>

**WHEREAS**, on February 24, 2025, the Debtors filed the *Debtors’ Objection to Motion of Insight Management and Consulting Services, Inc. for Estimation and Temporary Allowance of its Claim Solely for Voting Purposes Pursuant to Bankruptcy Rule 3018* [Docket No. 744].

**WHEREFORE, AFTER GOOD FAITH, ARM’S-LENGTH NEGOTIATIONS, THE PARTIES STIPULATE AND AGREE, SUBJECT TO APPROVAL OF THE COURT, AS FOLLOWS:**

1. Insight’s claim shall be temporarily allowed solely for voting purposes only in connection with the Plan in the amount of \$67,500,000.00 (the “Insight Voting Claim”). Insight shall be entitled to one vote on the Plan on account of the Insight Voting Claim in Class 7 (General Unsecured Claims). Any ballot cast on account of the Insight Voting Claim shall be counted as such.

2. Insight shall timely submit a ballot voting the Insight Voting Claim to accept the Plan in advance of the Voting Deadline; *provided, however*, Insight may elect to modify its vote on the Plan up until the hearing on confirmation of the Plan if there are any changes to the Plan

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<sup>2</sup> All capitalized terms used but not otherwise defined herein shall have the same meanings ascribed to them in the 3018 Motion.

that individually or in the aggregate have a material adverse effect on the treatment of the Insight Voting Claim in Class 7 (General Unsecured Claims).

3. The Voting Deadline and the General Claims Bar Date, solely as to Insight, shall be extended until the date that is one (1) business day following the date that the Court enters an Order approving this Stipulation.

4. Insight shall be deemed to have filed general unsecured proofs of claim in the amount of \$251,620,000.00 in each of the following Debtor cases: (i) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (Case No. 24-12534), (ii) IJKG Opco, LLC d/b/a Bayonne Medical Center (Case No. 24-12551), (iii) Hudson Hospital Opco LLC d/b/a Christ Hospital (Case No. 24-12546), and (iv) HUMCO Opco LLC d/b/a Hoboken University Medical Center (Case No. 24-12548) (collectively, the “Insight Filed Claims”). The Rule 3018 Motion shall be deemed annexed to the Insight Filed Claims to serve as the basis for such claims. Insight shall not be required to file any proofs of claim in respect of the Insight Filed Claims.

5. The Debtors’ claims agent (Epiq Corporate Restructuring, LLC) shall be directed, upon entry of an Order approving this Stipulation, to adjust the claims register in the Debtors’ chapter 11 cases to reflect the proper filing of the Insight Filed Claims against each of the applicable Debtors, which shall amend and supersede any previously filed or scheduled claims.

6. Nothing herein shall be deemed to be a determination of the allowance of any of Insight’s claims, including the Insight Filed Claims. Nothing contained herein shall constitute a waiver or limitation of the rights of Insight to assert additional claims, or modify or amend the Insight Filed Claims, or of the Debtors, the Committee, and/or the Litigation Trustee for the Litigation Trust, as applicable, to object to the Insight Filed Claim (or any amendment thereof) on any basis, including with respect to the allowance or disallowance of the Insight Filed Claim (or

any amendment thereof) for any reason, including determining distributions on account of any such claims under the Plan or otherwise.

7. Nothing contained herein shall be construed as a determination of the amount of the Insight Filed Claims (as same may be amended) for distribution purposes or otherwise, and all of the Parties' and the Litigation Trustee's respective rights with respect to same are fully preserved.

8. The deadlines and dates set forth in this Stipulation may be extended or otherwise modified by (a) written agreement of the Parties without further order of the Court; or (b) by the Court for good cause shown.

9. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved and neither the entry into this Stipulation nor anything contained herein shall be deemed to prejudice, impair or augment any of such rights, claims and defenses.

10. The undersigned are duly authorized and empowered to execute this Stipulation.

11. The Parties have participated in and jointly consented to the drafting of this Stipulation, and any claimed ambiguity shall not be construed for or against either of the Parties on account of such drafting.

12. This Stipulation shall be governed by and construed in accordance with the Bankruptcy Code. This Stipulation shall be binding upon and inure to the benefit of the Parties and their respective successors, assignees, designees, agents, attorneys and representatives, including the Litigation Trustee.

13. This Stipulation shall not be modified, altered, amended, or vacated without written consent of all Parties hereto.

14. This Stipulation may be executed in one or more counterparts, including by facsimile and/or electronic mail, each of which when so executed shall be deemed to be an original, and all of which, when taken together, shall constitute one and the same Stipulation.

15. The Court shall, and hereby does, retain jurisdiction with respect to the enforcement, implementation and interpretation of this Stipulation.

The Parties, by and through their respective attorneys of record in these chapter 11 cases, are signing this Stipulation as of the date written below.

Dated: February 27, 2025  
Wilmington, Delaware

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